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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 YEVGENIY ALEXANDROVICH NIKULIN,

17 Defendant.  
18  
19

) No. CR 16-00440 WHA

) UNITED STATES' AMENDED EXHIBIT LIST

) Trial: March 9, 2020

) Pretrial Conference: February 19, 2020

) Time: 1:30 p.m.

) Courtroom No. 12  
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The United States respectfully submits the attached exhibit list, which includes exhibits that the United States presently intends to introduce in its case-in-chief. This list is intended to be inclusive and is subject to amendment or supplementation as trial preparations progress. In addition, the list contains items, such as Reports of Investigation, that the United States does not intend to introduce in its case-in-chief, but that have been included here with exhibit numbers to reduce confusion should they need to be identified during trial. The government will notify the defense and Court of any changes to this list.

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U.S. AMENDED EXHIBIT LIST  
CR 16-00440 WHA

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
1				CD: Google search warrant results for chinabig01@gmail.com (August 29, 2012)	YN000002	
2				Certificate of authenticity for Google search warrant results, August 29, 2012	YN001674	
3 3C →	MAR 11 2020			Email messages from chinabig01@gmail.com account (from Exhibit 1)	YN001693	YN001743
3D →	MAR 10 2020					
4				CD: Search Warrant results for Dropbox account associated with chinabig01@gmail.com	YN000004	
5	JUL 07 2020	JUL 07 2020	Miller	InsidePro.com screenshots re dwdm	YN000063	YN000066
6	JUL 07 2020	JUL 07 2020	Miller	InsidePro.com screenshots re slavuti4	YN004642	YN004643
7				Forensic image of iMac computer	YN006683	
8				".bash_history" file from iMac computer	YN000262	YN000275
9				Logs (secure.log, secure.log.0bz2, secure.log.1.bz2) from iMac computer	YN000276	YN001631
10				Duplicate – Intentionally left blank		
11				CD containing results of Skype search warrant for account dex.007	YN003409	
12				Excerpts from response to Skype search warrant for account dex.007	YN003411-A	YN003411-D
13				Certificate of authenticity for Skype search warrant results	YN003412	
14	JUL 07 2020	JUL 07 2020	Miller	Google subscriber information for chinabig01@gmail.com (July 14, 2016)	YN003437	
15				Certificate of authenticity for Google records (July 14, 2016)	YN003440	

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
16	JUL 07 2020			Automatic intrusion logs	YN004640	
17	JUL 07 2020	JUL 07 2020	Miller	Excerpts of Automatic intrusion logs		
18	MAR 10 2020			Formspring logs	YN004671	YN004772
19	MAR 10 2020			Excerpts of Formspring logs		
20	JUL 07 2020			Microsoft search warrant results for fyofyofyo@hotmail.com account	YN015024	
21	7/8/2020	7/8/2020	Miller	Excerpt – Email messages from search warrant results for fyofyofyo@hotmail.com account (messages with ibo ibo and moy.yawik)		
22	7/8/2020	7/8/2020	Miller	Translation of email messages between fyofyofyo@hotmail.com and "ibo ibo" (French-English.)	YN004788	YN004813
23				Google subscriber information for account udalite@gmail.com (August 2015)	YN004955	YN004960
24				Certificate of authenticity for Google subscriber records (udalite@gmail.com)	YN004963	
25	7/8/2020	7/8/2020	Miller	Western Union records (Excel files)	YN005009	
26				External hard drive containing LinkedIn VPN and SSH system logs	YN005014	
27				Excerpts of LinkedIn VPN logs		
28				Excerpts of LinkedIn SSH logs		



Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
29				USB drive: Google search warrant results for udalite@gmail.com account (September 2013)	YN006282	
30				Certificate of authenticity for Google search warrant results, udalite@gmail.com	YN006284	
31				Excerpt – email messages from udalite@gmail.com account		
32, 32A	MAR 10 2020 MAR 10 2020			Account list from LinkedIn (Excel file)	YN006743	
33	MAR 10 2020			LinkedIn log for user nberry (Excel file)	YN006745	
34				Certificate of authenticity for Google subscriber records (August 20, 2012)	YN006790	
35	JUL 07 2020 JUL 07 2020		Miller	Google subscriber records for chinabig01@gmail.com (August 20, 2012)	YN006791	
36				Microsoft subscriber records for chinabig01@gmail.com	YN006802	YN006803
37				Certificate of authenticity for Microsoft records	YN006804	
38	JUL 07 2020 JUL 07 2020		Miller	Dropbox subscriber records for chinabig01@gmail.com	YN006809	YN006914
39				Google subscriber records for chinabig02@gmail.com	YN006823	
40				Certificate of authenticity for Google subscriber records (chinabig02@gmail.com)	YN006822	
41	JUL 07 2020 JUL 07 2020		Miller	Google subscriber records for chinabig01@gmail.com (November 6, 2012)	YN006843	
42				Certificate of authenticity for Google records (November 6, 2012)	YN006842	

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
43				Certificate of authenticity for Afraid.org records	YN007069	
44	JUL 07 2020	JUL 07 2020	Miller	Afraid.org records (Zip file)	YN007070	
45	JUL 07 2020	JUL 07 2020	Miller	Afraid.org Records	YN013363	YN013371
46				Certificate of authenticity for Google subscriber records (Google Plus ID 104244780492105546023)	YN007087	
47	JUL 07 2020	JUL 07 2020	Miller	Google subscriber records for Google Plus ID 104244780492105546023	YN007088	
48	JUL 07 2020	JUL 07 2020	Miller	Kongregate subscriber records	YN007768	YN007769
49				Google subscriber records for moy.yawik	YN012045	YN012051
50				Certificate of authenticity for Google subscriber records (moy.yawik)	YN012044	
51				Skype subscriber records for valeriy.krutov3	YN012181	YN012182
52	JUL 07 2020	JUL 07 2020	Miller	Google subscriber records for chinabig01@googlemail.com (December 4, 2014)	YN012971	
53				Certificate of authenticity for Google records (December 4, 2014)	YN012973	
54	JUL 07 2020	JUL 07 2020	Miller	Google subscriber records for chinabig01@googlemail.com (July 2015)	YN012976	
55				Certificate of authenticity for Google records	YN012979	
56				Skype subscriber records for dex.007	YN012984	YN012985
57				Paypal subscriber records for 8bit-man@mail.ru	YN013009	YN013014



Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
58				Instagram subscriber records for i.tak.soidet (October 2016)	YN013018	YN013019
59				Copy of Defendant's passport	YN013034	
60				Records provided by defendant	YN014641	YN014660
61				Translation of records provided by defendant	YN015025	YN015029
62				Google search warrant results for chinabig01@gmail.com account (2019)	YN014814	
63				Document custodian certification for Google search warrant results (2019)	YN014814	
64				Response to MLAT request to Ukraine	YN014838	YN014855
65				English translation of response to MLAT request to Ukraine	YN014820	YN014837
66				Drive: Forensic image of computer of Oleksander Ieremenko	YN014124	YN014125
67				CDs: FTK forensic report re computer of Oleksander Ieremenko	YN014111	YN014112
68	7/8/2020	7/8/2020	miller	Magnet Forensic report of Skype chats between dex.007 and vaiobro	YN003368	YN003374
69				Translation notes for Skype chats	YN003376	YN003378
70	7/8/2020	7/8/2020	miller	Translation of Skype chats (Excel file)	YN003378-A	
71				Photographs from computer of Oleksander Ieremenko	YN014101	YN014110
72	7/8/2020	7/8/2020		Video clip from computer of Oleksander Ieremenko	YN014096	
73	JUL 06 2020			Translation of video clip YN014096	YN015054	

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
74	7/6/20	7/6/20	MLAKOL	Video clip from computer of Oleksander Ieremenko	YN014097	
75	7/6/20	7/6/20	MLAKOL	Translation of video clip YN014097	YN015055	
76				Original images of Skype chats from computer of Oleksander Ieremenko	YN014082	YN014087
77				Skype contact list from computer of Oleksander Ieremenko	YN014088	
78				Skype log from computer of Oleksander Ieremenko	YN014089	
79				Response to MLAT Request to Russian Federation, January 28, 2013	YN003252	YN003265
80				Response to MLAT Request to Russian Federation, October 30, 2013	YN001901	YN001918
81				Certificate of authenticity for response to MLAT request to Russian Federation	YN001913	
82				Response to MLAT Request to Russian Federation, October 30, 2013	YN000216	YN000234
83				Certificate of authenticity for response to MLAT request to Russian Federation	YN000228	
84				English Translation of response to MLAT request to Russian Federation, translated February 19, 2014	YN003124	YN003133
85	JUL 07 2020	JUL 07 2020	Miller	Response to MLAT Request to Russian Federation, March 28, 2016	YN003446	YN003464
86	JUL 07 2020	JUL 07 2020	Miller	Certificate of authenticity for MLAT response from the Authority of the Russian Federation	YN003459	



Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
87				CD: Defendant's recorded calls, files 174_37, 159_924, 194_513	YN014139	
88	JUL 07 2020	JUL 07 2020	Miller	Translation/excerpt of defendant's call 174.37	YN015030	YN015038
89	JUL 07 2020	JUL 07 2020	Miller	Translation/excerpt of defendant's call 159.924	YN015039	YN015044
90	JUL 07 2020	JUL 07 2020	Miller	Translation/excerpt of defendant's call 194.513	YN015045	YN015049
91				CD: Defendant's recorded calls, file 169.194	YN014211	
92				Translation/excerpt of defendant's call 169.194	YN015050	YN015053
93				Report of Sasha Usenko (LinkedIn Security Architect) interview, 6/6/2012	YN000037	
94				Report of Nick Berry (LinkedIn) interview, 6/20/2012	YN000237	YN000239
95				Report of Ganesh Krishnan (LinkedIn) interview, 6/19/2012	YN000240	YN000242
96				Report of Nick Berry (LinkedIn) interview, 7/5/2012	YN0001653	YN001654
97				Drive: Forensic image of laptop computer	YN001655	
98				Report of Cory Louie (Dropbox) Interview, 9/11/2012	YN001746	YN001747
99				Report of Barry Abrahamson telephone interview, 8/15/13	YN004597	
100				Report of Barry Abrahamson telephone interview, 8/8/13	YN004598	YN004599
101				Report of Ade Olonoh interview, 7/12/2012	YN004644	YN004645
102				Email from Matt Cudworth dated 1/8/2014	YN004824	



Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
103				Email from Ade Olonoh re servers	YN004970	
104				Email from Matt Cudworth	YN004973	
105				Hostgator records	YN007075	YN007076
106				Google subscriber records (ittagheuer@gmail.com)	YN012219	
107				Certificate of authenticity for Google records	YN012221	
108				MyFitnessPal records	YN012231	
109				Certificate of authenticity for MyFitnessPal records	YN012232	
110				Certificate of authenticity for Yelp records	YN012264	
111				Yelp subscriber records	YN012263	
112				Report of Interview of Alex Kuznetsov	YN014451	YN014452
113	JUL 07 2020	JUL 07 2020	M. Miller	Vimeo subscriber records for chinabig01@gmail.com	YN012235	
114				Comcast subscriber records for 24.18.183.27	YN012763	
115				Certificate of authenticity for Comcast records	YN012764	
116				Google search warrant results for chinabig01@gmail.com (November 2013)	YN013542	
117	JUL 07 2020	JUL 07 2020	M. Miller	IP logs from Google search warrant results	YN001921	YN001952
118	JUL 07 2020	JUL 07 2020	M. Miller	Excerpt of results of 2019 search warrant to Google for chinabig01@gmail.com account (YN014814)	YN015056	YN015062

Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
119	JUL 07 2020	JUL 07 2020	Miller	Translation of search warrant result excerpts	YN015063	YN015069
120	4 July 8, 2020 120A	7/8/2020	Miller	Translation of email messages between fyofyofyo@hotmail.com and moy.yawik@gmail.com (Russian-English) (Complete translation at YN015677)	YN000202	
121				Instagram subscriber records (February 2019) for i.tak.soidet	YN015141	YN015217
122				Report of Bruno Connelly (LinkedIn) Interview	YN015858	YN015860
123				Certificate of authenticity for Instagram subscriber records (i.tak.soidet) (Exh. 58)	YN016050	
124				Summary of chinabig01@gmail.com account logins		
125	JUL 07 2020	JUL 07 2020	Miller	Google subscriber records for chinabig01@gmail.com (from Exhibit 1)		
126				Dropbox subscriber records for chinabig01@gmail.com (from Exhibit 4)		
127				Dropbox login records for chinabig01@gmail.com (from Exhibit 4)		
128	7/8/2020	7/8/2020	Miller	Attachment to translated email from fyofyofyo@hotmail.com search warrant results (from Exhibit 20)		
129				Microsoft subscriber information for fyofyofyo@hotmail.com (from Exhibit 20)		
130				Excerpts from udalite@gmail.com search warrant results (from Exhibit 29)		



Exh. No.	Date		Sponsoring Witness(es)	Description	Beg. Bates	End Bates
	Marked for Identification	Admitted into Evidence				
131	MAR 11 2020 MAR 11 2020			Summary chart of logs from N. Berry computer (from Exhibit 7)		
132				CD: Defendant's recorded calls 20821178 20821234, 20960956, 21172516	YN014856	YN014856
133				Translation/excerpt of defendant's call no. 20821178	YN016285	YN016293
134				Translation/excerpt of defendant's call call no. 20821234	YN016294	YN016299
135	JUL 07 2020	JUL 07 2020 Miller		Translation/excerpt of defendant's call no. 20960956	YN016300	YN016301
136	JUL 07 2020	JUL 07 2020 Miller		Translation/excerpt of defendant's call no. 21172516	YN016302	YN016308
137	JUL 07 2020			Certificate of authenticity for Kongregate records (Exh. 48)	YN016310	YN016310
138				Certificate of authenticity for Vimeo records (Exh. 113)	YN016315	YN016315
139				Certificate of authenticity for PayPal records (Exh. 57)	YN016320	YN016321
140				Certificate of authenticity for Western Union records (Exh. 25)	YN016325	YN016325
141				Certificate of authenticity for Instagram (Facebook) records (Exh. 121)	YN016364	YN016364

142	MAR 11 2020		Dropbox IP log	YN016428	YN016430
143			CD: Google search warrant results for r00talka@gmail.com (February 2020)		

DATED: February 18, 2020

Respectfully submitted,

DAVID L. ANDERSON  
United States Attorney

/s/  
MICHELLE J. KANE  
KATHERINE L. WAWRZYNIAK  
Assistant United States Attorneys



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIACASE NO. C R-16-0440 WHA

DATE: \_\_\_\_\_

VSA

vs

Nikulin

## EXHIBIT LIST

(X) Plaintiff

( ) Defendant

EXHIBIT NUMBER	Marked	Admitted	Sponsoring Witness	DESCRIPTION
143 B	JUL 06 2020			
143 C	JUL 06 2020			
76A	JUL 06 2020			
26B	JUL 07 2020	JUL 07 2020	Miller	
3A	JUL 07 2020	JUL 07 2020	Miller	
3B	JUL 07 2020	JUL 07 2020	Miller	
3E	JUL 07 2020	JUL 07 2020	Miller	
62B	JUL 07 2020	JUL 07 2020	Miller	
89A	JUL 07 2020	JUL 07 2020		
26B	JUL 07 2020	JUL 07 2020		
44A	JUL 07 2020	JUL 07 2020	Miller	
19A	JUL 07 2020	JUL 07 2020	Miller	
62A	JUL 07 2020	JUL 07 2020	Miller	
88A	JUL 07 2020	JUL 07 2020	Miller	
90A	JUL 07 2020	JUL 07 2020	Miller	
135A	JUL 07 2020	JUL 07 2020	Miller	
136A	JUL 07 2020	JUL 07 2020	Miller	
147	JUL 07 2020			
153	JUL 07 2020			

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIACASE NO. CR 16-440-WHA

DATE: \_\_\_\_\_

United States of America vs Yevgeniy Nikulin

## EXHIBIT LIST

( ) Plaintiff

( ) Defendant

EXHIBIT NUMBER	Marked	Admitted	Sponsoring Witness	DESCRIPTION
17A	JUL 07 2020	JUL 07 2020	Miller	
113A	7/8/2020	7/8/2020	Muller.	
142A	7/8/2020	7/8/2020	Muller.	
143 I	7/8/2020	7/8/2020	Muller.	
143 E	7/8/2020	7/8/2020	Muller	
143 F	7/8/2020	7/8/2020	Muller.	
143 J	7/8/2020	7/8/2020	Muller	
143 K	7/8/2020	7/8/2020	Muller.	
148	7/8/2020	7/8/2020	Muller.	
149	7/8/2020	7/8/2020	Muller.	
150	7/8/2020	7/8/2020	Muller.	
143 D	7/8/2020	7/8/2020	Muller.	
152 B	7/8/2020	7/8/2020	Muller.	
152 C	7/8/2020	7/8/2020	Muller.	Russian Pass port.
66 D	7/8/2020	7/8/2020	Muller.	
71 A.	7/8/2020	7/8/2020		
66 A	7/8/2020	7/8/2020		
76 B	7/8/2020	7/8/2020		
32 C	7/8/2020	7/8/2020		



DATE: \_\_\_\_\_

VS

( ) Defendant

[illegible]